

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

Todd A. Boock (SBN 181933)
tboock@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU I/S/O
OTTO TRUCKING LLC'S MOTION TO
COMPEL DISCOVERY RE:
WAYMO'S INVESTIGATION**

Courtroom: F, 15th Floor
Judge: Hon. Jacqueline S. Corley

1 I, Hong-An Vu, declare as follows:

2 1. I am an associate at the law firm of Goodwin Procter, LLP and counsel of record
3 for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Otto Trucking’s Motion
6 to Compel Discovery Re: Waymo’s Investigation.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript
8 of proceedings before Judge Corley on August 28, 2017.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of the rebuttal expert report
10 of Paul French.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
12 of proceedings before Judge Corley on August 31, 2017.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of the document Bates-
14 stamped WAYMO-UBER-00086812.

15 6. Attached hereto as Exhibit 5 is a true and correct copy of the document Bates-
16 stamped WAYMO-UBER-00086817.

17 7. Attached hereto as Exhibit 6 is a true and correct copy of the document Bates-
18 stamped WAYMO-UBER-00086953.

19 8. Attached hereto as Exhibit 7 is a true and correct copy of the document Bates-
20 stamped WAYMO-UBER-00086815.

21 9. Attached hereto as Exhibit 8 is a true and correct copy of the document Bates-
22 stamped WAYMO-UBER-00084600.

23 10. Attached hereto as Exhibit 9 is a true and correct copy of the document Bates-
24 stamped WAYMO-UBER-00086840.

25 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the transcript
26 for the deposition of Paul French on October 3, 2017.

27 12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the transcript
28 for the deposition of Gary Brown on September 6, 2017.

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the transcript for the deposition of Sasha Zbrozek on September 6, 2017.

14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the transcript for the deposition of Kristinn Gudjonsson on September 8, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of October, 2017 in Los Angeles, California.

/s/ Hong-An Vu
Hong-An Vu

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 20, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 20, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE